

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PATRIARCH PARTNERS  
AGENCY SERVICES, LLC

*Plaintiff-  
Counterclaim Defendant,*

v.

ZOHAR CDO 2003-1, LTD.,  
ZOHAR II 2005-1, LTD., and  
ZOHAR III, LTD.,

*Defendants-  
Counterclaim Plaintiffs,*

—and—

ZOHAR CDO 2003-1, LLC,  
ZOHAR II 2005-1, LLC, and  
ZOHAR III, LLC,

*Defendants.*

Case No. 16-cv-4488(VM)(KHP)

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Local Civil Rule 56.1 Statement of Undisputed Material Facts, and the Declaration of Jonathan E. Pickhardt and exhibits thereto, Defendant-Counterclaim Plaintiff David Dunn, as Trustee for the Zohar Litigation Trust-A (the “Trust”), will move this Court, at a date and time to be determined by this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, New York, 10007, pursuant to Federal Rule of Civil Procedure 56, to dismiss in its entirety with prejudice Plaintiff-Counterclaim Defendant Patriarch Partners Agency Services, LLC’s (“PPAS”) Count II, and to grant summary judgment as to PPAS’s liability on the Trust’s Counterclaim Count III.

Dated: July 18, 2024  
New York, New York



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**QUINN EMANUEL URQUHART  
& SULLIVAN LLP**  
Jonathan E. Pickhardt  
Ellison Ward Merkel  
Evan Hess

51 Madison Avenue, 22nd Floor  
New York, NY 10010  
(212) 849-7000  
[jonpickhardt@quinnmanuel.com](mailto:jonpickhardt@quinnmanuel.com)  
[ellisonmerkel@quinnmanuel.com](mailto:ellisonmerkel@quinnmanuel.com)  
[evanhess@quinnmanuel.com](mailto:evanhess@quinnmanuel.com)

*Counsel to the Zohar Litigation Trust-A*